

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*

Case No. 1:19-op-45068-DAP

*County of Douglas, State of Nebraska v.  
Purdue Pharma, et al;*

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**STIPULATION AND [PROPOSED] ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO NATIONAL SETTLEMENT AGREEMENTS**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff, County of Douglas, State of Nebraska (“Plaintiff”) and Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc. (collectively and together with their Released Entities, the “Janssen Defendants”<sup>1</sup>) that, pursuant to the election of Plaintiff to participate in the Janssen Settlement Agreement, which was announced on July 21, 2021, and is now dated March 30, 2022, which is binding on Plaintiff and the Janssen Defendants, and which has an Effective Date of April 2, 2022 (a copy of which is available at DN 4305), all claims of Plaintiff against any Settling Janssen

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<sup>1</sup> The Released Entities are each and every entity of any of the Janssen Defendants that is a “Released Entity” as set forth in Section I.61 and Exhibit J of the Janssen Settlement Agreement, dated as of March 30, 2022, a copy of which is attached as Appendix B to DN 4305. Appendix B represents a good faith effort by the Janssen Defendants to list all Released Entities that may be individually named in any of the Dismissing Plaintiffs’ complaints. Appendix C is not intended to limit the scope of Released Entities, and to the extent that Plaintiff or Janssen Defendants subsequently identify any Released Entity that should have been included on Appendix C, available at DN 4305, they will inform the Clerk of the Court.

Defendants, are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs. The Court shall retain jurisdiction with respect to the Janssen Settlement Agreement to the extent provided under that Agreement.

Dated April 29, 2022

Respectfully submitted,

Agreed as to form and substance:

/s/Jayne Conroy  
Jayne Conroy  
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Johnson, Janssen Pharmaceutica, Inc.  
n/k/a Janssen Pharmaceuticals, Inc., and  
Ortho-McNeil-Janssen Pharmaceuticals,  
Inc. n/k/a Janssen Pharmaceuticals, Inc*

SO ORDERED this \_\_\_ day of April, 2022.

\_\_\_\_\_  
Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2022, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/Jayne Conroy  
Jayne Conroy